

From: WallaceElton

Affiliation:

Address: 69 Elm Hill Street
Springfield, Vermont, 05156

Comment: Northeast NPR-A Plan Amendment Bureau of Land Management Alaska State Office
Alaska State Office
222 West 7th Avenue
Anchorage, AK 99513-7599

Dear Northeast NPR-A Plan Amendment Alaska State Office,

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I am writing to comment on the proposed amendment to the oil and gas leasing plan for the Northeastern Planning Area of the National Petroleum Reserve - Alaska.

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I oppose the preferred alternative. I am deeply concerned about the probable impact on birds and other wildlife that would result from the drastic reduction in size of the Teshekpuk Lake Surface Protection Area as proposed in that alternative. In addition, I oppose weakening of other environmental protections such as the ban on permanent roads during exploration.

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Birds

As you should know, the lakes and wetlands within the current protection area form one of the most significant areas of wildlife habitat in their entire Arctic region of the globe and are widely recognized as such by scientists. Tens of thousands of geese, which travel there from at least three countries, gather in this area each year to molt. Data readily available to you indicate that as much as half the Brant (an Audubon WatchList species) and more than 40% of the White-fronted Geese utilize lakes that would have no or reduced protection under the preferred alternative during molt. Thousands of Canada and Snow Geese also gather there. Geese are highly sensitive to disturbance during molting. In fact, it is no accident that this remote area is used so heavily (and in some cases in increasing numbers) by geese for molting.

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Birds

Many other species of waterfowl, including Tundra Swans from my part of the country and several other WatchList species, nest in the area. All of these species would be at risk from habitat loss and degradation and disturbance under the preferred alternative. In addition, as noted by the National Research Council last year, there would be a marked increase in nest predation as a result of oil and gas development.

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Furthermore, the movements of the Teshekpuk Lake caribou herd, called the most important on the North Slope for subsistence hunting by Native leaders, would be insufficiently protected under the preferred alternative.

You have presented no convincing scientific evidence to change the decision you made in 1998. The risks to wildlife are too great and the potential impacts too widespread and long-lasting to proceed with the preferred alternative. And with nearly 90% of the planning area already open to development and more than a million acres already under lease, there can be no legitimate argument that the surface protection area poses an unreasonable impediment to oil and gas development.

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Therefore, I urge you to select Alternative A, the No Action Alternative, in order to preserve some semblance of balance between conservation and development in the planning area.

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Then, I request that you prepare a new plan that will strengthen the existing environmental and wildlife protection in the area and comply with the direction of Congress that you minimize ecological damage throughout the NPR-A.

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Thank you for the opportunity to comment on this important decision.

Sincerely,

Wallace Elton
69 Elm Hill Street
Springfield, Vermont 05156-2419

Attached: None